Regional Strategic Partners, LLC

2008 Annual CPNI Certification
47 C.F.R. § 64.2009(e)
EB Docket No. 06-36

COMPANY NAME: Regional Strategic Partners, LLC

FILER ID: 827197

OFFICER: Lee E. Scarbrough, III

TITLE: Vice President

I, Lee E. Scarbrough, III, hereby certify that I am an officer of Regional Strategic Partners, LLC ("Regional Strategic Partners") and that I am authorized to make this certification on behalf of Regional Strategic Partners. I have personal knowledge that Regional Strategic Partners has established operation procedures that are adequate to ensure compliance with the Commission's rules governing Customer Proprietary Network information ("CPNI"), to the extent that such rules apply to Regional Strategic Partners or to any of the information obtained by Regional Strategic Partners. See 47 C.F.R. §64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures Regional Strategic Partners employs to ensure that it complies with the requirements set forth in §64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to Regional Strategic Partners or to the information obtained by Regional Strategic Partners.

Signed: Lee E Scarbrough III

Date: 3/4/2010

Regional Strategic Partners, LLC

STATEMENT OF POLICY REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION

In accordance with Section 222 of the Communications Act and the Federal Communications Commission's ("FCC") CPNI Rules (47 C.F.R. Section 64.2001, *et seq.*), Regional Strategic Partners, LLC ("Regional Strategic Partners") files this Statement of Policy outlining the Company's procedures for accessing, using and storing Customer Proprietary Network Information ("CPNI").

Regional Strategic Partners provides telecommunications services to retail customers. Therefore, because Regional Strategic Partners may access, use, or store CPNI when providing these types of services, the Company undertakes the steps outlined in this Statement of Policy to protect CPNI from unauthorized access or misuse.

Definition of CPNI

Under federal law, CPNI is certain customer information obtained by a telecommunications provider during the course of providing telecommunications services (including interconnected VoIP) to a customer. This includes information relating to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier.

Examples of CPNI include information typically available from telephone-related details on a monthly bill such as the types of services purchased by a customer, numbers called, duration of calls, directory assistance charges, and calling patterns. CPNI does not include names, addresses, and telephone numbers, because that information is considered subscriber list information under applicable law.

Use of CPNI

It is the policy of Regional Strategic Partners not to use CPNI for any activity other than as permitted by applicable law. Any disclosure of CPNI to other parties (such as affiliates, vendors and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by Regional Strategic Partners to the customer. If Regional Strategic Partners is not required by law to disclose CPNI or if the intended use is not otherwise permitted under FCC Rules, the Company will first obtain the customer's consent prior to using or sharing CPNI.

Regional Strategic Partners follows industry-standard practices to prevent unauthorized access to CPNI by a person other than the subscriber or Company. However, Regional Strategic Partners cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information.

CPNI Notification

Regional Strategic Partners notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.

Employee Training Policies

All employees of Regional Strategic Partners are trained as to when they are, and are not, authorized to use CPNI.

Specifically, Regional Strategic Partners prohibits its personnel from releasing CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances.

1) When the customer has pre-established a password;
2) When the information requested by the customer is to be sent to the customer's addressof record; or
3) When Regional Strategic Partners calls the customer's telephone number of record and discusses the information with the party initially identified by customer when service was initiated.

Disclosure to Business Customers

Regional Strategic Partners may negotiate alternative authentication procedures for services that the Company provides to business customers that have a dedicated account representative and a contract that specifically addresses the protection of CPNI.

Disciplinary Procedures

Regional Strategic Partners has informed its employees and agents that it considers compliance with the Communications Act and FCC Rules regarding the use, disclosure, and access to CPNI to be very important.

Violation by company employees or agents of such CPNI requirements will lead to disciplinary action (including remedial training, reprimands, unfavorable performance reviews, probation, and termination), depending upon the circumstances of the violation (including the severity of the violation, whether the violation was a first time or repeat violation, whether appropriate guidance was sought or received from a supervisor, and the extent to which the violation was or was not deliberate or malicious).

Use of CPNI in Sales and Marketing Campaigns

Regional Strategic Partners does not use CPNI in any marketing campaigns.

However, if Regional Strategic Partners does use CPNI in marketing campaigns, the company will maintain a record of all sales and marketing campaigns that use the CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.

Regional Strategic Partners will also implement a system to obtain prior approval and informed consent from its customers in accordance with the CPNI Rules. This system will allow for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.

Prior to commencement of a sales or marketing campaign that utilizes CPNI, Regional Strategic Partners will establish the status of a customer's CPNI approval. The following sets forth the procedure that will be followed by the Company:

- Prior to any solicitation for customer approval, Regional Strategic Partners will notify customers of their right to restrict the use of, disclosure of, and access to their CPNI.
- Regional Strategic Partners will use opt-in approval for any instance in which Company must obtain customer approval prior to using, disclosing or permitting access to CPNI.
- A customer's approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval.
- Records of approvals are maintained for at least one year.
- Regional Strategic Partners provides individual notice to customers when soliciting approval to use, disclose or permit access to CPNI.
- The CPNI notices sent by Regional Strategic Partners comply with FCC Rule 64.2008(c).

Regional Strategic Partners will also establish a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and will maintain compliance records for at least one (1) year.

FCC Notification

Company is prepared to provide written notice within five (5) business days to the FCC of any instance where the opt-in mechanisms do not work properly or to such a degree that consumers' inability to opt-in is more than an anomaly.

Third Party Use of CPNI

To safeguard CPNI, prior to allowing joint venturers or independent contractors access to customers' individually identifiable CPNI, Regional Strategic Partners will require all such third parties to enter into a confidentiality agreement that ensures compliance with this Statement of Policy and Regional Strategic Partners shall also obtain opt-in consent from a customer prior to disclosing the information to such third parties. In addition, Regional Strategic Partners requires all outside agents to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided.

Regional Strategic Partners requires express written authorization from the customer prior to dispensing CPNI to new carriers, except as otherwise required by law.

Regional Strategic Partners does not market or sell CPNI information to any third party.

Law Enforcement Notification of Unauthorized Disclosure

If an unauthorized disclosure of CPNI occurs, Regional Strategic Partners shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").

Regional Strategic Partners shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.

Notwithstanding the above, Regional Strategic Partners shall not wait the additional seven (7) days to notify its customers if the Company determines there is an immediate risk of irreparable harm to the customers.

Regional Strategic Partners shall maintain records of discovered breaches for a period of at least two (2) years.

Customer Complaints

Regional Strategic Partners has not received any customer complaints in the past year concerning the unauthorized release of or access to CPNI.

Actions taken against Pretexters

Regional Strategic Partners has not taken any actions against data brokers before state commissions, state or federal courts, or the FCC in the past year. Regional Strategic Partners has no information, other than information that has been publicly reported, regarding the processes that pretexters are using to attempt to access CPNI.

Annual CPNI Certification

Pursuant to FCC regulations, 47 C.F.R. § 64.20089(e), Regional Strategic Partners will annually submit to the FCC, prior to March 1st, a CPNI Certification of Compliance and accompanying Statement regarding the company's CPNI policies and operating procedures. These documents certify that Regional Strategic Partners complied with federal laws and FCC regulations regarding the protection of CPNI throughout the prior calendar year.